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Counsel for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R.
 individually, and on behalf of all other similarly
 situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 3:23-cv-03440-AMO

CLASS ACTION

**DECLARATION OF YANA HARD IN
 SUPPORT OF JOINT STIPULATION TO
 FILE FIRST AMENDED COMPLAINT
 PURSUANT TO FED. R. CIV. P. 15(a)(2),
 TO EXTEND TIME TO FILE FIRST
 AMENDED COMPLAINT, AND TO
 CONTINUE CASE MANAGEMENT
 CONFERENCE**

COMPLAINT FILED: July 11, 2023

DECLARATION OF YANA HART ISO JOINT STIPULATION TO FILE FAC, TO EXTEND
 TIME TO FILE FAC, AND TO CONTINUE CASE MANAGEMENT CONFERENCE

1 I, Yana Hart, hereby declare as follows:

2 1. I am a partner at Clarkson Law Firm, P.C. (“**Clarkson**”) and counsel of record for
3 Plaintiffs J.L., C.B., K.S., P.M., N.G., R.F., J.D., and G.R. (“**Plaintiffs**”). I am licensed to practice
4 in all state and federal courts in the State of California, and I am a member in good standing of the
5 State Bars of California, Florida, and the District of Columbia. I have personal knowledge of the
6 facts set forth in this declaration and, if called as a witness, I could and would testify competently.
7 I make this declaration based on personal knowledge, and in support of the Joint Stipulation to
8 File First Amended Complaint, to Extend Time to File First Amended Complaint, and to Continue
9 Case Management Conference in accordance with L.R. 6-2.

10 2. There has been no previous extension of the time to file an Amended Complaint.

11 3. The Parties previously stipulated to continue the Case Management Conference and
12 related deadlines from October 26, 2023 to November 30, 2023 (ECF 22), which was so-ordered
13 by the Court (ECF 23).

14 4. Since that stipulation was submitted, Plaintiffs decided to amend their complaint in
15 lieu of opposing Defendant’s motion to dismiss. Due to commitments in several other
16 professional and personal matters, Plaintiffs have requested until January 5, 2024 to do so, and
17 Defendant does not oppose.

18 5. The Parties believe it would be more efficient and orderly for the Case Management
19 Conference to take place after the operative complaint has been filed and the Parties have had an
20 opportunity to consider that complaint and meet and confer concerning a discovery and case
21 management plan in light of that complaint.

22 6. No schedule for the case has been set, so the continuance would not affect the case
23 schedule.

24 I declare under penalty of perjury under the laws of the United States and the State of
25 California that the foregoing is true and correct. Executed on November 3, 2023 at San Diego,
26 California.

DATED: November 3, 2023

CLARKSON LAW FIRM, P.C.

/s/ Yana Hart

Yana Hart, Esq.